

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 25-10068 (CTG)

(Jointly Administered)

Re: Docket Nos. 929 and 1664

**CERTIFICATION OF COUNSEL REGARDING
ORDER REJECTING LUBBOCK, TX LEASE**

The undersigned counsel to Ann Aber in her capacity as plan administrator in the above-captioned cases (the “Plan Administrator”), hereby certifies as follows:

1. On May 16, 2025, the debtors and debtors-in-possession in the above-captioned cases filed the *Fifth Notice of Assumption and Assignment of Certain Executory Contracts and/or Unexpired Leases* [Docket No. 929] (the “Fifth Assumption Notice”) regarding the assumption and assignment of the unexpired leases set forth on Schedule 2 to the Fifth Assumption Notice (the “Assumption List”).

2. The Assumption List designated that certain nonresidential real property lease dated February 8, 1994 between Jo-Ann Stores, LLC and AFP Rockridge 2019, LLC (the “Landlord”) located at Rockridge Plaza 5217 82nd St., Unit 123, Lubbock, TX (Store No. 1488) (the “Lease Agreement”) for assumption and assignment to Dollar Tree Stores, Inc. (“Dollar Tree”).

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors' mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

3. On August 27, 2025, the Plan Administrator filed the *Notice of Withdrawal of Fifth Notice of Assumption and Assignment of Certain Executory Contracts and/or Unexpired Leases Solely with Respect to Lubbock, TX Lease* [Docket No. 1664] (the “Notice of Withdrawal”).

4. In addition to the Notice of Withdrawal, counsel to the Landlord has requested the entry of a formal rejection order with respect to the Lease Agreement.

5. Attached hereto as **Exhibit A** is a proposed form of order rejecting the Lease Agreement (the “Proposed Rejection Order”) effective as of August 27, 2025. Counsel to the Landlord has confirmed that the Landlord has no comments to the Proposed Rejection Order.

6. Accordingly, the parties request entry of the Proposed Rejection Order attached hereto as **Exhibit A** at the Court’s earliest convenience.

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Dated: August 29, 2025
Wilmington, Delaware

COLE SCHOTZ P.C.

/s/ Jack M. Dougherty

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*Counsel for Ann Aber, solely in her capacity as the Plan
Administrator of JOANN Inc., et al.*